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**Monsanto**

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FYI*  
**EPA-ARWM/PMTS**

**DEC 21 1984**

**MONSANTO INDUSTRIAL CHEMICALS CO.**  
1700 South Second Street  
St. Louis, Missouri 63177  
Phone: (314) 622-1400

**Region VII K.C., MO**

December 20, 1984

Dr. Howard Fribush  
Office of Solid Waste WH-565B  
Environmental Protection Agency  
401 M Street, SW  
Washington, D.C. 20460

Dear Dr. Fribush:

As required by 40 CFR Part 775 Subpart J (Disposal of Waste Material Containing TCDD) this letter serves as notification to the EPA of our intent to remove 2,3,7,8-TCDD (dioxin) contaminated residues from three buildings at our plant site for ultimate disposal by high temperature incineration.

1. The three contaminated buildings are identified as QQ, Q, and AA buildings at the Monsanto John F. Queeny Plant located at 1700 South Second Street, St. Louis, Missouri 63177. Corporate headquarters for Monsanto Company is located at 800 North Lindbergh Boulevard, St. Louis, Missouri 63166.
2. Questions may be directed to Neil E. Prange, Environmental Protection Supervisor at (314) 622-1467.
3. The actual quantity of dioxin contaminated material is very small, probably not exceeding a few hundred pounds. It consists of encrusted residues in obscure locations in the three buildings. Concentrations of dioxin for each building are as follows:

QQ up to 11.83 PPB  
Q up to 1.92 PPB  
AA up to 24.24 PPB

The above analyses were performed at Monsanto Company/Dayton Laboratory/Dayton, Ohio 45407 using gas chromatography/mass spectroscopy.

  
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RCRA RECORDS CENTER

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The waste material which will result from the clean-up will be well below the above concentrations because of the dilution contributed by included non-contaminated residues, filter aid, and filter carbon. Scrapped personal protective gear used by clean-up personnel will also be included.

4. It is estimated that from 100 to 200 25 gallon fiber drums of material will result from the clean-up. The clean-up itself will involve first totally sealing off the building and then employing a variety of techniques, as appropriate, which will include vacuuming, scraping, shoveling, solvent wiping, and high pressure water cleaning.
5. The actual clean-up activity will be accomplished by a disposal contractor, O.H. Materials Co., P. O. Box 551, Findlay, Ohio 45839-0551.

Disposal by high temperature incineration will be carried out at Rollins Environmental Services, P.O. Box 609, Deer Park, Texas. 77536.

6. At the present time, the dioxin contaminated encrusted residues are still in place in the buildings. After the contamination is removed and collected in the 25 gallon fiber drums along with other inert materials, the fiber drums will each be overpacked in 55 gallon steel drums for added security and will be staged in a locked, empty warehouse structure prior to shipment to the disposal firm.

The clean-up operation is presently scheduled to begin on February 25, 1985. Because we need at least 2 weeks advance notice to our clean-up contractor, we respectfully request that the 60 days evaluation period be shortened to 30 days.

Sincerely,

*Neil E. Prange*

Neil E. Prange  
Environmental Protection Supervisor

NEP:cs

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cc: Robert L. Morby, Chief  
Hazardous Materials Branch  
US EPA Region VII  
324 East Eleventh Street  
Kansas City, Missouri 64106

Fred Lafser, Director  
Missouri Department of Natural Resources  
P. O. Box 176  
Jefferson City, Missouri 65102